

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

/

**DECLARATION OF VANESSA BAEHR-JONES IN SUPPORT OF OPPOSITION TO
DEFENDANT PETERS' MOTION TO COMPEL**

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.

2. I am lead counsel for Plaintiffs Jane Does 1-9 in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear pro hac vice in this District.

3. Attached as Exhibit A is a true and correct copy of the January 4, 2024 letter sent by Heather Collins to counsel for all Defendants.

4. During the December 15, 2023 status conference, I stated that due to safety and privacy concerns, a meet and confer would be necessary before providing the true identities of all the "Females" in the proposed second amended class complaint.

5. On Wednesday, January 10, 2024, Plaintiffs' counsel Elizabeth Kramer and I met and conferred with Defendant City's counsel Emily Taylor and K. Erickson Herrin and reached agreement that all JCPD personnel who are not named as defendants will sign Exhibit A to the protective prior to receiving confidential identities, with the exception of the Johnson City Risk Manager.

6. Attached as Exhibit B is a true and correct copy of the letter sent to counsel for all Defendants which I sent along with a confidential list of the full names of the individuals in the second amended class action complaint who are referred to as Females 1 through 14. (confidential list not attached).

7. Attached as Exhibit C is a true and correct copy of the January 11, 2024 email sent by counsel for Defendant Peters.

8. Attached as Exhibit D is a true and correct copy of the January 13, 2024 email sent by counsel for Plaintiffs in response to counsel for Defendant Peters' January 11, 2024.

9. Attached as Exhibit E is a true and correct copy of the January 15, 2024 email sent by counsel for Defendant Peters.

10. Attached as Exhibit F is a true and correct copy of the January 16, 2024 email sent by counsel for Plaintiffs.

11. Attached as Exhibit G is a true and correct copy of the January 17, 2024 email sent by counsel for Defendant Peters.

Dated this January 19, 2024.

/s Vanessa Baehr-Jones
Vanessa Baehr-Jones